

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 2455.02
“REVISION TO THE EXPORT PROVISIONS OF THE CATHODE
RAY TUBE (CRT) RULE - FINAL RULE”**

**DRAFT
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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This Information Collection Request (ICR) is entitled “Revision to the Export Provisions of the Cathode Ray Tube (CRT) Rule (Final Rule)”

EPA ICR Number 2455.02, OMB ICR Number 2050-0208.

1(b) Short Characterization

The U.S. Environmental Protection Agency (EPA) promulgated the CRT rule on July 28, 2006 (71 FR 42928). In that rule, EPA amended its regulations under the Resource Conservation and Recovery Act (RCRA) to streamline the management requirements for used CRTs in an effort to encourage recycling and reuse of these materials rather than landfilling or possible incineration. The CRT rule also contained requirements for used CRTs exported for reuse or recycling. Exporters of used CRTs for recycling must notify EPA of an intended shipment before the shipment occurs. Notifications may cover exports extending over a 12-month or shorter period. The notification must include several items of information. When EPA receives this information, it notifies the receiving country. When the receiving country consents in writing to receive the CRTs, EPA forwards an Acknowledgement of Consent (AOC) to the exporter. The exporter may not ship the CRTs until he receives the AOC. With respect to CRTs that are exported for reuse, the CRT rule requires exporters to submit a one-time notification to EPA with contact information and a statement that they are exporting the CRTs for reuse. They must keep copies of normal business records demonstrating that each shipment will be reused. (See 40 CFR 261.39 and 261.41 for existing notification and recordkeeping requirements about used CRTs exported for reuse or recycling. The burden associated with these requirements is approved under EPA ICR Number 1189.24, and the OMB control number for this ICR is 2050-0053.)

EPA is revising the export provisions of the CRT rule. The purpose of these revisions is to address certain implementation concerns with the current export provisions of the CRT rule. EPA is finalizing a definition of “CRT exporter” that includes any intermediaries arranging for the export. Because CRTs are sometimes exported to more than one recycler in the receiving country, EPA is requiring that the exporter state the name and address of the recycler or recyclers and the estimated quantity of CRTs to be sent to each facility, as well as the names of any alternate recyclers.

In addition, EPA is expanding the current reuse notice and model the notice on that required for CRTs exported for recycling. Instead of a one-time notice, EPA is requiring that reuse notices be submitted to cover a twelve month or shorter period. EPA

is also adding additional items of information to the notice, including contact information about the exporter and the destination facility, the frequency or rate at which the CRTs would be exported, the quantity of CRTs, transport information, and a description of the manner in which the CRTs will be reused in the receiving country. Furthermore, EPA is requiring that the exporter sign a certification that the CRTs are fully functioning or capable of being functional after refurbishment. EPA believes that the expanded notice will help the Agency determine whether the exported CRTs have been handled as products that are actually reused in the receiving country.

EPA is also adding a requirement that exporters of CRTs for recycling submit an annual report documenting the actual numbers of CRTs exported during the previous calendar year. This number may differ from the estimate submitted in the original notice. This information will help ensure that the shipments occurred under the terms approved by the receiving country, and would enable EPA to provide receiving countries with information that may help them to determine the quantity of CRTs that were received in a particular country for recycling. Finally, EPA is requiring that, if documents are written in a language other than English, CRT exporters of used CRTs for reuse must provide a third-party translation of the normal business records into English upon its request.

In Sections 1 through 5 of this ICR, EPA presents a comprehensive description of the new information collection requirements in the final rule to revise the export provisions of the CRT rule. In Section 6, EPA estimates the total annual hour and cost burden to respondents and the Agency associated with these new information collection requirements.

In the following paragraphs, EPA briefly describes the new information collection requirements covered in this ICR.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

EPA is requiring the information collection under the authority of Sections 2002(a), 3001, 3002, 3004, and 3006 of RCRA, as amended. The final rule revises the notification that must be submitted to EPA when CRTs are exported for reuse or recycling and adds a requirement that exporters of CRTs for recycling submit an annual report documenting the actual numbers of CRTs exported during the previous calendar year. EPA believes the information collection requirements covered in this ICR are needed to ensure that CRTs exported for reuse or recycling are managed in compliance with the regulations.

2(b) Practical Utility and Users of the Data

Since promulgation of the CRT rule in 2006, it has become apparent that some CRTs ostensibly exported for reuse are actually disassembled and recycled when they

reach the receiving country, sometimes under unsafe conditions. EPA will use the collected information to ensure exported CRTs have been handled as products that are actually reused in the receiving country. In addition, the collected information would enable EPA to provide receiving countries with information that may help them to determine the quantity of CRTs that were received in a particular country for recycling.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

None of the information required by the final rule would duplicate information required by existing RCRA regulations.

3(b) Public Notice

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register*. The notice of proposed rule was published March 15, 2012 at 77FR15336. The public comment period extended through May 14, 2012.

3(c) Consultations

The revisions to the export provisions of the CRT rule were recommended by the Interagency Task Force on Electronics Stewardship (the “Task Force”) in its report titled *National Strategy for Electronics Stewardship* (July 20, 2011). Several federal agencies participated in drafting the recommendations of the *National Strategy for Electronics Stewardship*, including the General Services Administration, Office of the US Trade Representative, and the Departments of Commerce, Defense, and Energy. On behalf of the Task Force, EPA solicited public comment from stakeholders through a Federal Register notice. Also on behalf of the Task Force, the Council on Environmental Quality held three stakeholder listening sessions in March 2011 with state and local government agencies, non-governmental organizations, and industry, respectively. Comments provided through both of these methods were evaluated by the Task Force and considered in developing the National Strategy on Electronics Stewardship.

3(d) Effects of Less Frequent Collection

EPA has carefully considered the information collection burden imposed upon the regulated community by the final rule. EPA is confident that those activities required of respondents are necessary, and to the extent possible, the Agency has attempted to minimize the burden imposed. EPA believes strongly that, if the minimum information collection requirements of the final rule are not met, neither the respondents (e.g., exporters) nor EPA can ensure that CRTs exported for reuse or recycling are managed in compliance with the regulations. In addition, EPA would be unable to provide receiving countries the information that they would need to help ensure that CRTs are properly managed.

3(e) General Guidelines

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, EPA's ICR Handbook, and other applicable OMB guidance.

3(f) Confidentiality

Section 3007(b) of RCRA; 40 *CFR* part 2, subpart B; and 40 *CFR* 260.2 contain provisions for confidentiality. If a business asserts a claim of confidentiality covering any of the information collection requirements covered in this ICR, EPA must and will treat the information in accordance with the regulations cited above. EPA also will assure that this information collection complies with the Privacy Act of 1974 and OMB Circular 108.

3(g) Sensitive Questions

No questions of a sensitive nature are included in any of the information collection requirements.

THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and SIC/NAICS Codes

The following is a list of Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes associated with industries most likely affected by the information collection requirements included in the existing CRT rule. The respondents for the final information collection requirements covered in this ICR are exporters of CRTs from these industries. The Agency estimates that a total of approximately 12 entities exported CRTs for recycling during 2011 (i.e., per EPA data on the number of approved exporters and the number of export notices that were submitted during 2011). However, far more entities are on record as being exporters of CRTs for purposes of reuse. Based on the number of CRT Reuse Notifications submitted during 2013, there exists approximately 140 such entities in the U.S. (i.e., according to 2013 data published on EPA's CRT informational website at [<http://www.epa.gov/epawaste/hazard/international/crts/recycling.htm>]).

Industry	SIC Code	NAICS Code
AGRICULTURE		
Agricultural crop production	01	111
Agricultural livestock production	02	112
Agricultural services	07	115, 311, 541, 561, 812
Forestry	08	111, 113, 115
Fishing, hunting, trapping	09	111, 112, 114
MINING		
Metal mining	10	212, 213
Coal mining	12	212, 213

Industry	SIC Code	NAICS Code
Oil & gas extraction	13	211, 213
Non-metallic minerals, except fuels	14	212, 213
CONSTRUCTION		
General contractors	15	233-235
Heavy construction	16	233-235
Special trade contractors	17	233-235
MANUFACTURING		
Food & kindred products	20	111, 311, 312
Tobacco products	21	312
Textile mill products	22	313-315
Apparel & other textile products	23	313-315, 336, 339
Lumber & wood products	24	113, 321, 333
Furniture & fixtures	25	336, 337, 339
Paper & allied products	26	322, 326
Printing & publishing	27	323, 511, 512
Chemicals & allied products	28	211, 311, 325, 331
Petroleum and coal products	29	324
Rubber & miscellaneous plastics products	30	316, 325, 326, 337, 339
Leather & leather products	31	315, 316, 321
Stone, clay, and glass products	32	212, 327
Primary metal industries	33	331
Fabricated metal products	34	332, 337, 339
Industrial machinery & equipment	35	331-335, 339
Electronic & other electronic equipment	36	332-336, 512
Transportation equipment	37	332, 333, 336, 488, 541, 811
Instrument & related products	38	322, 325, 333, 334, 339
Miscellaneous manufacturing	39	325, 336, 339, 488
TRANSPORTATION		
Local & inter-urban passenger transit	41	485, 487
Trucking & warehousing	42	493, 484, 488, 492, 531
U.S. postal service	43	491
Water transportation	44	483, 487, 488, 532
Transportation by air	45	481, 488, 492, 561, 621
Pipelines, except natural gases	46	486
Transportation services	47	488, 532, 561, 722

Industry	SIC Code	NAICS Code
Communication	48	513
Electronic, gas, & sanitary services	49	221, 488, 562
WHOLESALE TRADE		
Wholesale trade-durable goods	50	421, 441-444, 446, 453
Wholesale trade-nondurable goods	51	312, 313, 422, 444, 451, 454
Bldg. materials & garden supplies	52	444, 453
RETAIL TRADE		
General merchandise store	53	452
Food stores	54	311, 445, 447, 722
Auto dealers & service station	55	441, 447, 452
Apparel & accessory stores	56	315, 448
Furniture & home furnishing stores	57	337, 442, 451
Eating & drinking places	58	722
Miscellaneous retail	59	339, 443, 445, 446, 448, 451, 453, 454, 522, 722
FINANCE, INSURANCE, AND REAL ESTATE		
Depository institution	60	521, 522
Nondepository institution	61	522, 523
Security & commodity brokers	62	523, 525, 533, 551, 813
Insurance carriers	63	523-525
Insurance agents, brokers, & services	64	523-525
Real estate	65	233, 531, 711, 812
Holding & other investment offices	67	523, 525, 533, 551, 813
SERVICES		
Hotels & other lodging places	70	721
Personal services	72	512, 532, 561, 611, 811, 812
Business services	73	234, 313, 314, 323, 325, 334, 421, 443, 491, 511, 512, 514, 522, 532, 541, 561, 562, 711, 811, 812
Auto repair, services, & parking	75	326, 488, 532, 811, 812
Misc. repair services	76	115, 235, 335, 442, 443, 451, 488, 561, 562, 711, 811
Motion picture	78	334, 421, 512, 514, 532, 541, 561, 711
Amusement & recreation services	79	487, 532, 561, 611, 711, 712, 713
Health services	80	339, 541, 621
Legal services	81	541
Educational services	82	514, 611
Social services	83	623, 624, 813, 922
Museums, botanical, zoological gardens	84	712

Industry	SIC Code	NAICS Code
Membership organization	86	561, 813, 912
Engineering & management service	87	233, 234, 541, 561, 611
Private household services	88	81
Services	89	512, 541, 711

4(b) Information Requested

(1) Revised Export Notification for Used CRTs Destined for Recycling

Under existing 40 *CFR* 261.39(a)(5), exporters of used, broken CRTs must provide written notification to EPA of an intended export before the CRTs are scheduled to leave the U.S. The existing notice (40 *CFR* 261.39(a)(5)(F)) requires the exporter to state the name and address of the recycler and any alternate recycler. Because CRTs are sometimes exported to more than one recycler in the receiving country, EPA is replacing this language with a requirement that the exporter state the name and address of the recycler or recyclers and the estimated quantity of CRTs to be sent to each facility, as well as the names of any alternate recyclers.

(2) Annual Report for CRTs Exported for Recycling

Under new 40 *CFR* 261.39(a)(5)(x), exporters must file with EPA no later than March 1 of each year, a report summarizing the quantities (in kilograms), frequency of shipment, and ultimate destination(s) of all CRTs exported during the previous calendar year. Such reports must also include the following:

- The name, EPA ID number (if applicable), and mailing and site address of the exporter;
- The calendar year covered by the report;
- A certification signed by the exporter which states:

“I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.”

(3) Revised Export Notification for Used CRTs Destined for Reuse

Under existing 40 *CFR* 261.41, exporters of used, intact CRTs for reuse must submit a one-time notification with minimal information to EPA. To require exporters to submit more complete information about the purported reuse of the exported CRTs over a specific period of time, EPA is adding items to the reuse notification that are modeled on those required in the notification for CRTs exported for recycling. This notification, under 40 *CFR* 261.41(a), may cover export activities extending over a twelve (12) month or lesser period. The notification must be in writing, signed by the exporter, and include the following information:

- Name, mailing address, telephone number and EPA ID number (if applicable) of the exporter of the CRTs.
- The estimated frequency or rate at which the CRTs are to be exported and the period of time over which they are to be exported.
- The estimated total quantity of CRTs specified in kilograms.
- All points of entry to and departure from each transit country through which the CRTs will pass, a description of the approximate length of time the CRTs will remain in such country and the nature of their handling while there.
- A description of the means by which each shipment of the CRTs will be transported (e.g., mode of transportation vehicle (air, highway, rail, water, etc.), type(s) of container (drums, boxes, tanks, etc.)).
- The name and address of the ultimate destination facility or facilities and the estimated quantity of CRTs to be sent to each facility, as well as the name of any alternate destination facility or facilities.
- A description of the manner in which the CRTs will be reused (including reuse after refurbishment) in the foreign country that will be receiving the CRTs.
- A certification signed by the exporter which states:

“I certify under penalty of law that the CRTs described in this notice are fully functioning or capable of being functional after refurbishment. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.”

(4) Translation of Foreign Language Records into English

Under 40 CFR 261.41(b), CRT exporters of used CRTs for reuse must keep copies of normal business records, such as contracts, demonstrating that each shipment of exported CRT will be reused. This documentation must be retained for a period of at least three years from the date the CRTs were exported. If the documents are written in a language other than English, CRT exporters of used CRTs for reuse must also provide a third-party translation of the normal business records into English upon request by EPA.

5. THE INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

The following section discusses how EPA or the implementing agency will collect and manage the information received from respondents. This section also includes a discussion of how EPA has taken steps to ensure that the information collections are not overly burdensome on small entities.

5(a) Agency Activities

(1) Export Notification for Used CRTs Destined for Recycling

Per the existing CRT rule, Agency activities associated with the conditional exclusion for used CRTs exported for recycling will continue as described below. There will be only minor additional information received under the proposed revised export notification for the Agency to review and process.

- Receive and review notification submitted by an exporter of used CRTs to determine whether or not the notification is complete. A notification is complete when EPA determines that it satisfies the requirements of 40 *CFR* 261.39(a)(5)(i).
- Solicit, from exporter, additional information requested by the receiving country.
- Provide, in conjunction with the Department of State, the complete notification to the receiving country.
- Forward the receiving/transit country's written consent to the receipt of the used CRTs to the exporter.
- Prepare and send written notification to the exporter if the receiving/transit country objects to the receipt of the used CRTs or withdraws a prior consent.
- Keep copies of notifications, consents, and other related documents.

(2) Annual Report for CRTs Exported for Recycling

Agency activities associated with the new requirement for submission of an annual report for exporters of CRTs sent for recycling include the following:

- Receive and record the report.

(3) Export Notification for Used CRTs Destined for Reuse

Per the existing CRT rule, Agency activities associated with the conditional exclusion for used CRTs exported for reuse will continue as described below. There will be additional information received under the revised export notification, similar to the information contained in the notice for CRTs exported for recycling, for the Agency to review and process (see Exhibit 3).

- Receive and process notification submitted by exporter of used CRTs.
- Keep copy of notification.

5(b) Collection Methodology and Management

In collecting and analyzing the information submitted under 40 *CFR* 261.39(a)(5) and 261.41, EPA will use equipment such as personal computers and applicable database software, where appropriate. EPA will ensure the accuracy and completeness of the collected information by reviewing each submittal.

5(c) Small Entity Flexibility

In establishing the existing conditional exclusion for used CRTs, EPA considered the reporting and recordkeeping burden for small businesses. The conditional exclusion was a regulatory relief initiative that reduced hour and cost burden for generators and subsequent handlers of excluded CRTs, particularly small entities. These reductions in hour and cost burden under the existing exclusion will not be significantly impacted as result of the newly proposed information requirements.

5(d) Collection Schedule**(1) Export Notification for Used CRTs Destined for Recycling**

Exporters of used CRTs destined for recycling must provide written notification to EPA of an intended export before the CRTs are scheduled to leave the U.S. A complete notification must be submitted 60 days before the initial shipment is intended to be shipped off site. This notification may cover export activities extending over a 12-month or lesser period. In addition,

upon request by EPA, exporters must furnish to EPA any additional information that a receiving country requests in order to respond to a notification.

(2) Annual Report for CRTs Exported for Recycling

Exporters must file with EPA no later than March 1 of each year, a report summarizing the quantities (in kilograms), frequency of shipment, and ultimate destination(s) of all CRTs exported during the previous calendar year.

(3) Export Notification for Used CRTs Destined for Reuse

Exporters of used CRTs destined for reuse must send a notification to EPA. This notification may cover export activities extending over a 12-month or lesser period. In addition, they must keep, at the facility, copies of normal business records (e.g., contracts) demonstrating that each shipment of exported CRTs will be reused.

(4) Translation of Foreign Language Records into English

If documents are written in a language other than English, CRT exporters of used CRTs for reuse must provide a third-party translation of the normal business records into English upon EPA's request.

6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION

6(a) Estimating Respondent Burden Hours

In Exhibits 1, 2 and 3, EPA estimates the respondent burden hours associated with the new information collection requirements in the final rule. Exhibit 1 includes estimates of burden hours (total and by labor type) per entity (exporter or respondent) for reading the rule. EPA estimates 3.5 hours per respondent for reading the rule and a universe of 152 respondents. This would result in a total of 532 hours for all of the respondents reading the rule. For a one-time activity like reading the rule, EPA annualizes the burden hours over a three year effective life of the ICR. This is done by dividing the total hours by 3 ($532/3 = 177$ hours). Exhibit 2 includes estimates of burden hours (total and by labor type) per respondent for the new annual reporting by exporters of CRTs for recycling. EPA estimates 3.4 hours per large exporter and 2.1 hours per small exporter. EPA also estimates 12 exporters of CRTs for recycling, and assumes that one-half (6) of the exporters are large exporters and one-half (6) are small exporters. This would result in a total of 33 hours for the new annual reporting by all 12 exporters. Exhibit 3 includes estimates of burden hours (total and by labor type) per notice prepared and submitted by a respondent under the modified reuse notification requirements. EPA estimates 0.15 hour per modified notice and a total of 245 to 455 reuse notices submitted by respondents each year. This would result in a total of 37 hours to 68 hours for preparation and submission of the modified reuse notices by respondents. Therefore, based on the above burden hour calculations, EPA estimates that the total annual respondent burden for the new information collection requirements in the final rule ranges from 247 to 278 hours.

6(b) Estimating Respondent Costs

EPA estimates that the total annual respondent cost for the new information collection requirements in the final rule to be \$22,235 to \$28,492. The total annual cost includes the cost for reading the rule, cost for new annual reporting by exporters of CRTs for recycling, and the cost for preparation and submission of the revised reuse notices by respondents. In addition, the total annual cost also includes costs for translating foreign language records into English. EPA's estimates for costs to be incurred by respondents for the new information collection requirements in the final rule are included in Exhibits 1, 2, 3 and 4.

Labor Costs

For purposes of this analysis, EPA estimates an average hourly respondent labor cost of \$107.06 for managerial staff, \$70.08 for technical staff, and \$36.60 for clerical staff. These labor rates were originally obtained by relying on prior EPA Cost Assessments and then updated to 2011 using Employment Cost Indices developed by the U.S. Bureau of Labor Statistics. (See "Economic Impacts Assessment for Revisions to the Export Provisions of the Cathode Ray Tubes (CRTs) Final Rule," which is available in the public docket ID No. EPA-HQ-RCRA-2011-1014).

Annual Capital and Operation & Maintenance Costs

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements in the final rule.

O&M costs are those costs associated with paperwork requirements incurred continually over the life of the ICR. They are defined by the EPA as "the recurring dollar amount of costs associated with O&M or purchasing services." Minimal O&M costs were assumed to be associated with the preparation and submission of new Annual Reports and Notification requirements in the final rule. These costs are for mailing, copying, faxing, and for making telephone calls.

6(c) Estimating Agency Burden and Costs

In Exhibits 2 and 3, EPA provides estimates of the Agency hour and cost burden associated with the new information collection requirements covered in this ICR. EPA estimates an average hourly labor cost of \$74.67 for managerial staff (GS-14, Step 1), \$63.20 for technical staff (GS-13, Step 1), and \$36.64 for clerical staff (GS-9, Step 1). To derive these hourly estimates, EPA referred to the *General Schedule (GS) Salary Table 2011*. This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal Government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive these loaded hourly rates. (See "Economic Impacts Assessment for Revisions to the Export Provisions of the Cathode Ray Tubes (CRTs) Final Rule," which is available in the

public docket ID No. EPA-HQ-RCRA-2011-1014).

Receive and Record Annual Reports Submitted by Exporters of CRTs for Recycling

EPA estimates that it will receive 12 annual reports per year. EPA estimates that it will incur \$24.64 to receive and record each annual report (see Exhibit 2). Thus, EPA estimates that the Agency will experience an annual cost of \$295.68 (i.e., 12 annual reports/year x \$24.64/report) to meet this requirement of the final rule.

Receive and Process Revised Reuse Notifications

EPA estimates that it will incur an additional cost of \$6.32 per notice to receive and process these notices (see Exhibit 3). Thus, EPA estimates that the Agency will experience a total incremental annual cost in the range of \$1,548 to \$2,876 (i.e., 245 to 455 notices per year x \$6.32 per notice) under the final rule.

	Annual Cost
Reports Submitted by Exporters	\$295.68
Revised Reuse Notifications	\$2,876 (high range)
Total	\$3,172

6(d) Estimating the Respondent Universe and Total Burden and Costs

The Agency estimates that a total of approximately 12 entities exported CRTs for recycling during 2011 (i.e., per EPA data on the number of approved exporters and the number of export notices that were submitted during 2011). However, far more entities are on record as being exporters of CRTs for purposes of reuse. Based on the number of CRT Reuse Notifications submitted during 2013, there exists approximately 140 such entities in the U.S. (i.e., according to data from 2013 published on EPA's CRT informational website at [<http://www.epa.gov/epawaste/hazard/international/crts/recycling.htm>]). Therefore, as shown below in Table 1, EPA estimates that 152 entities will be subject to the new information collection requirements covered in this ICR.

TABLE 1

NUMBER OF EXPORTER ENTITIES (RESPONDENTS) POTENTIALLY AFFECTED BY THE FINAL RULE

Type of Entity	Number of Entities
Exporter of CRTs for Recycling	12

Exporter of CRTs for Reuse	140
Total	152

Respondent Burden and Cost

In the following paragraphs, EPA discusses the assumptions used in developing the respondent burden estimates associated with the new information collection requirements covered in Exhibits 1, 2, 3 and 4 of this ICR.

Reading the Regulations

EPA estimates that 152 U.S. exporters will need to read the rule in order to understand and comply with the new requirements. For purposes of this analysis, we assumed that the hours required for reading/reviewing this new rule would be similar to the hours used in EPA's assessment of the impacts associated with reading/reviewing the 2009 Final Rule governing the Exporting of Spent Lead-Acid Batteries (SLAB). In Exhibit 1, EPA estimates 3.5 hours per respondent for reading the rule for the 152 respondents. This would result in a total of 532 hours for all of the respondents reading the rule. As noted in Section 6(a), for a one-time activity like reading the rule, EPA annualizes the burden hours over a three year effective life of the ICR. This is done by dividing the total number of hours by three ($532/3 = 177$).

New Annual Reporting by Exporters of CRTs for Recycling

As noted above in Section 6(d), EPA estimated that approximately 12 U.S. exporters of CRTs sent for recycling will be required to prepare and submit an annual report in accordance with this provision of the final rule. Furthermore, this new annual report for these exporters has been fashioned after other existing annual reporting requirements recently codified in the 2009 Final Rule governing the Exporting of Spent Lead-Acid Batteries (SLAB) from the U.S. Therefore, EPA used the cost estimates for annual reporting already available in the May 2009 Cost Assessment prepared for the "SLAB Rule", as the best and most recent relevant reference (see Footnote 2 in "Economic Impacts Assessment for Revisions to the Export Provisions of the Cathode Ray Tubes (CRTs) Final Rule," which is available in the public docket ID No. EPA-HQ-2011-1014). Based on these figures, EPA estimates that the cost for a CRT exporter to prepare and submit an annual report ranges from \$156.07 to \$203.36, depending upon whether the size of the exporter is large vs. small. For purposes of analysis, EPA assumed a 50/50 distribution of these exporters (e.g. with half considered large and half considered small). Thus, EPA estimated that the total cost of the annual reporting requirement for exporting CRTs for recycling is \$2,158.32 (i.e., \$203.36/annual report x 6 Large Recycling Exporters, plus \$156.07/annual report x 6 Small Recycling Exporters). (See Exhibit 2).

Revisions to Reuse Notifications (Asking for additional Information)

Under the current CRT Rule, exporters already must submit notifications to EPA indicating their intent to export CRTs. The final CRT Rule revisions call for very minor additional reporting elements to the current CRT rule requirements. To calculate the notification-related cost impacts, EPA started by relying on the original burden hour estimates associated with the current notification requirements. EPA then adjusted these burden hour estimates to reflect our best estimate of the potential burden associated with the final changes in the notification requirements. Our best estimate is that these burden estimates would not exceed 10% of the burden attributable to the current notification requirements. Then EPA utilized the adjusted burden estimates and labor rates in combination with the projected quantity of CRT Notices to derive costs associated with the relevant proposed changes to the CRT notification process. Based on the calculations above, EPA estimated that CRT exporters will submit between 245 and 455 notices each year. We estimated that each notice will cost an additional \$10.51 (see Exhibit 3). In total, EPA estimates that the additional costs to exporters will be in the range of \$2,575 to \$4,782 (i.e., 245 to 455 notices per year x \$10.51 per notice) under the final rule.

Total Respondent Burden and Cost

In Exhibits 1, 2, 3 and 4, EPA presents a summary of the total annual respondent burden and costs associated with the new information collection requirements in the final rule. The specific information collection activities of the new paperwork requirements are described throughout this ICR.

6(e) Bottom Line Burden Hours and Costs

Respondent Tally

In Exhibits 1, 2, 3 and 4, EPA presents the total annual respondent burdens and costs associated with the new information collection requirements in the final rule. As described specifically in Section 6(d) above, there are 152 respondents (12 U.S. exporters of CRTs sent for recycling and 140 U.S. exporters of CRTs sent for reuse) that will be subject to the new information collection requirements covered in this ICR. Based on the information in Exhibits 1, 2, 3 and 4, the total annual respondent burden for the new paperwork requirements will range from 247 to 278 hours, and the total annual respondent cost for the new paperwork requirements will be approximately \$22,235 to \$28,492

6(f) Reasons for Change in Burden

EPA is revising certain export provisions of the CRT final rule published on July 28, 2006 (71 FR 42928) to ensure that CRTs are managed in compliance with the regulations. These revisions will require exporters of CRTs to provide some additional information to EPA (see Section 6(d)).

6(g) Burden Statement

The estimated annual burden for this collection of information ranges from 0.15 to 3.52 hours per response for the 152 respondents. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-RCRA-2011-1014, which is available for online viewing at www.regulations.gov, or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2011-1014 and OMB Control Number 2050-0208 in any correspondence.

Exhibit 1
Estimated Costs for Reading & Understanding the New Rule Requirements

Activity	Cost per Entity							Cost of All Entities	
	Managerial Staff Hours ^a	Technical Staff Hours ^a	Clerical Staff Hours ^a	Hours	Labor Cost ^b	Materials Cost ^c	Total Cost per Entity	Number of Entities ^d	Total Cost
Reading the Regulations									
U.S. Exporters	1.00	2.50	0.00	3.50	\$282.26	\$0.00	\$282.26	152	\$42,904

NOTES:

^a Based on hourly burden estimates discussed in Section 3.3 of EIA (*).

^b Based on hourly labor rates discussed in Section 3.2 of EIA.

^c Based on materials costs discussed in Section 3.4 of EIA.

^d Based on universe assumptions discussed in Section 3.1 of EIA.

(*) "Economic Impacts Assessment for Revisions to the Export Provisions of the Cathode Ray Tubes (CRTs) Final Rule."

Exhibit 2
Estimated Costs for New Annual Reporting by Exporters of CRTs for Recycling

Activity	Cost per Entity							Cost for all Entities	
	Managerial Staff Hours ^a	Technical Staff Hours ^a	Clerical Staff Hours ^a	Total Hours	Total Labor Cost ^b	Material Cost ^c	Total Cost	Number of Entities ^d	Total Cost
Annual Report									
Large U.S. Exporters									
Research specific export information	0.00	1.00	1.00	2.00	\$106.68	\$0.00	\$106.68	6	\$640.08
Prepare and submit report	0.10	1.00	0.30	1.40	\$91.77	\$5.20	\$96.97	6	\$581.82
Subtotal:					\$198.45	\$5.20	\$203.65	6	\$1,221.90
Small U.S. Exporters									
Research specific export information	0.00	0.50	0.50	1.00	\$70.08	\$0.00	\$70.08	6	\$420.48
Prepare and submit report	0.10	0.50	0.50	1.10	\$80.79	\$5.20	\$85.99	6	\$515.94
Subtotal:					\$150.87	\$5.20	\$156.07	6	\$936.42
Total for Exporters:									\$2,158.32
EPA									
Receive and record report	0.00	0.10	0.50	0.60	\$24.64	\$0.00	\$24.64	12	\$295.68
Total for EPA:	0.00	0.10	0.50	0.60	\$24.64	\$0.00	\$24.64	12	\$295.68
TOTAL: (for both Exporters & EPA)									\$2,454
NOTES:									
^a Based on hourly burden estimates discussed in Section 3.3 of EIA (*).									
^b Based on hourly labor rates discussed in Section 3.2 of EIA.									
^c Based on material costs discussed in Section 3.4 of EIA.									
^d Based on universe assumptions discussed in Section 3.1 of EIA, which reveal a total of approximately 12 CRT Recycling Exporters in the U.S. And, we assume there is a 50/50 Percent Ratio regarding the total number of Large vs. Small U.S. CRT Exporters, such that there are 6 of each type in the above calculations.									
(*) See Exhibit 1.									

Exhibit 4

Estimated Costs for Translating Foreign Language Records into English

Breakout of Entities that Conduct More vs. Less Annual Shipments of CRTs for Reuse ^{a-}	Assumed Number of Shipments per Year (Equals Assumed Number of Business Records that Must be Retained per Year ^{b-}	Assumed Percentage of Shipment Records Potentially Subject to an Audit and Review ^{c-}	Assumed Proportion of Audited Records that are in Foreign Text and Require English Translation ^{c-}	<u>Estimated Number of Business Records that will Need Translation</u> ^c	Average Word Count per Record Translated ^c	Total Estimated Unit Cost per Word Count & Level of Complexity ^d	(Low Estimate) of Total Cost per Record Translated	(High Estimate) of Total Cost per Record Translated	Total Estimated Range of Costs Per Year
105 (or 75% of 140) Entities Make 2 to 4 Shipments per Year	2 to 4	25 %	50 %	27 to 53	500	\$ 0.20 to \$ 0.25	\$100	\$125	\$2,700 to \$6,625
35 (or 25% of 140) Entities Make Only 1 Shipment	1	25 %	50 %	5	500	\$ 0.20 to \$ 0.25	\$100	\$125	\$500 to \$625
Overall Totals:	1 to 4	NA	NA	32 to 58	NA	NA	NA	NA	\$3,200 to \$7,250

NOTES:

^a Based on using the assumed number of reuse notifications (see Sec. 3.5 of EIA*) as a direct proxy for the number of annual shipments potentially subject to review.

^b Based on assumption that every shipment will only need 1 English language business record as proof that their CRTs were shipped for purposes of reuse.

^c See Section 3.6 of EIA for further explanation of underlying assumptions and the estimated quantity of Normal Business Records that will Need Translation.

^d Based on range of potential costs for attaining third party translation of foreign language documents into English (see Section 3.7 of EIA). *See Exhibit 1